

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DODORA UNIFIED
COMMUNICATIONS, INC.,

Plaintiff,

v.

DIRECT INFORMATION PVT. LTD.,
LOGICBOXES, WEBHOSTING. INFO.,
TRANSECUTE (I) PVT. LTD.,
RESELLERSRS, INC., AND
ANSWERABLE, INC., COLLECTIVELY
d/b/a "DIRECTI.COM"

Defendants

Civil Action No. 05-10016-NMG

PLAINTIFF'S MOTION TO MODIFY DISCOVERY DEADLINES

NOW COMES plaintiff Dodora Unified Communications, Inc., by its attorney, and respectfully moves the Court to modify the discovery deadlines established by consent of the parties at the hearing held on January 21, 2005. In support of the motion, Dodora states that subsequent to that hearing, it determined that it would be appropriate for it to obtain new counsel. Prior counsel has filed a motion for leave to withdraw, which has not been allowed as yet, however new counsel (the undersigned) has filed his appearance. Because of new counsel's schedule of other matters as well as the need to prepare a response to certain of the defendants' motion to dismiss, he was unable to prepare and serve written discovery requests upon the defendants prior to today. A request for production of documents was served electronically today.

The relief sought by this motion, therefore, is only that the written discovery request served today be deemed timely and that the response deadline be extended by two weeks from today, based on the original agreement. No other change in the schedule or the trial date is requested.

Prior to filing this motion I conferred with counsel for the defendants and believe that he assents to the limited relief requested herein.

WHEREFORE Dodora requests that the written discovery request served electronically upon the defendants today be deemed timely.

Dated: March 9, 2005

Dodora Unified Communications
By its attorney,

/s/ David G. Baker

David G. Baker, Esq.
105 Union Wharf
Boston, MA 02109
(617) 367-4260
BBO# 634889

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the within motion upon the defendants by emailing a copy of the same to dhecker@PBL.COM, and upon information and belief a copy was also served by the Court's CM/ECF system.

/s/ David G. Baker

David G. Baker, Esq.